

STATEMENT OF PROBABLE CAUSE

CRN 01-040862

Comes now, a sworn Law Enforcement Officer for the State of Missouri, knowing that false statements on this form are punishable by law, and that the facts contained herein are true, states as follows:

On 04-28-01 at approximately 1930 hours, uniformed officers with the Kansas City Missouri Police Department responded to the area of 59th and Kensington located in Kansas City, Jackson County, Missouri in regards to the headless body of a young person that was located north of 59th Street. On 05-01-01, the head of the victim was discovered approximately two blocks to the east of where the body was discovered in the same wooded area.

An autopsy was performed by the Jackson County Medical Examiner's office at which time the death was ruled a homicide.

On May 3, 2005, Detectives with the Kansas City Police Department Homicide Unit responded to Muskogee, Oklahoma and contacted the local police department in regards to a tip received which led them to believe that the victim's parents were currently in that city. On May 4, 2005, Detectives with the Kansas City Police Department Homicide Unit interviewed the mother of the victim **Michelle M. Johnson B/F 1/9/75**. At that time, **Michelle M. Johnson** advised the detectives that sometime before Easter 2001, she, her husband **Harrell L. Johnson B/M 09-07-79**, who is the stepfather of the victim and her daughter **Erica Michelle Marie Green B/F 5/15/97** were staying with some friends at 4101 E. 59th Street located in Kansas City, Jackson County, Missouri. According to **Michelle** she observed **Harrell** kick **Erica** in the head with his foot. **Erica** collapses to the floor and becomes unresponsive for about 2 days, at which time **Erica** stayed unresponsive and her condition did not improve. **Michelle** stated that they did not seek medical treatment for **Erica** because both her and **Harrell** had active warrants for their arrest. After **Erica** died, **Michelle** stated that her and **Harrell** removed **Erica** from the residence after dark so they would be undetected by the other occupants of the residence. She stated that **Harrell** carried **Erica** while they both walked to a church parking lot located at 59th & Kensington, Kansas City, Jackson County, Missouri. She stated that **Harrell** carried the **Erica's** body with a pair of hedge clippers down a trail out of site into a wooded area north of 59th St. She stated that she returned to the residence and waited for **Harrell** who returned a short time later, at which time **Harrell** told her that he cut **Erica's** head off in the wooded area where he discarded the body. **Harrell** then told her that he put **Erica's** head in the trash bag and placed it in the dumpster in the church parking lot. **Michelle** stated that she told **Harrell** that they couldn't leave the head in the dumpster, so they both returned to the dumpster and removed the head that was contained in a knotted black plastic bag and walked a couple of blocks to the east and threw the head contained in the trash bag in the woods north of 59th street.

On May 5, 2005, Detectives with the Kansas City Missouri Police Department Homicide Unit contacted **Harrell L. Johnson** who was currently being held in a Muskogee, Oklahoma jail with no bond on unrelated charges. At that time, **Harrell** stated that some time in April 2001 he was staying with some family at 4101 E. 59th St. located in Kansas City, Jackson County, Missouri along with his wife **Michelle Johnson** and his stepdaughter **Erica Green**. According to **Harrell**, they were all in a bedroom located inside the residence when he started telling **Erica** to lie down and go to bed. At that time, **Erica** continued to disobey him and refused to go to bed. **Harrell** stated that he had been drinking and using PCP that day and became angry with **Erica**. He then stated that he grabbed **Erica** with his right hand and threw her to the ground while kicking her in the right shoulder at the same time, which caused **Erica** to fall to the ground and hit her head on the floor, which caused her to become unconsciousness and unresponsive. According to **Harrell**, both him and **Michelle** cared for **Erica** inside the residence without seeking medical attention because both he and **Michelle** had outstanding warrants for their arrest. **Harrell** stated that **Erica's** condition did not improve through the night and into the

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next day and approximately 10 hours after the incident occurred Erica died inside the residence. According to Harrell approximately six hours after Erica died, both him and Michelle exited the residence threw a window located in the back bedroom that they were staying in. Harrell stated that they waited until dark and he exited the residence first and Michelle handed Erica to him through the window after Michelle had dressed her. Once outside the residence in the backyard, Harrell saw a pair of hedge sheers lying in the yard and told Michelle to pick them up. From there, they both walked to a wooded area located at 59th and Kensington with him carrying Erica and Michelle carrying the hedge sheers. Harrell stated that he carried Erica's body approximately six feet into the wooded area along a gravel trail with Michelle following. Harrell stated that Michelle continued to walk back toward the road and check for any cars before returning and removing Erica's clothing. Harrell then stated that he cut Erica's head off with the hedge sheers while Michelle stood a few feet away watching. After cutting the head off, Harrell stated that both him and Michelle pushed Erica's body off the trail into the woods and Harrell placed her head into two black plastic trash bags. They both then walked to a dumpster located in a church parking lot close by, with him carrying the head and Michelle carrying the sheers, and he threw the head into the dumpster. At that time, Michelle tells him that people might smell the head in the dumpster, so she proceeded to retrieve the head contained in the plastic bags, and they both walked to the same wooded area where they left the body and Michelle handed the head to him and he threw the head into the woods.

Further, affiant saith not.

Det. Steve Morgan #4138
Detective's Signature

Det. Steve Morgan #4138
Detective's Name and Serial Number
Printed or Typewritten

The Court finds probable cause, this 5th day of May, 2005

Margaret A. ...
Judge

BY [Signature]
JACOBSON
CIRCUIT COURT
MO-MC
2005 MAY -5 PM 4:52

Circuit Court of _____ County, State of Missouri.